

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEVEN McDERMOTT,)	
Plaintiff,)	
)	
vs.)	Civil Action No.: 04-CV-12253
)	
FED EX GROUND SYSTEMS, INC.,)	
Defendant.)	
)	

AMENDED DISCOVERY SCHEDULE

Statement of the Case

This action arises from a multiple vehicle motor vehicle accident which occurred on February 7, 2003 on State Highway 84 in Milford Pennsylvania. The plaintiff alleges that, shortly after a multiple truck accident in a snow storm, a tractor trailer truck owned by the defendant Fed Ex Ground Systems, Inc. and operated by Timothy Pruitt, a citizen of Mississippi negligently struck the plaintiff's truck, causing him permanently disabling personal injuries.

The defendant, Fed Ex Ground Systems, Inc, denies that either it or Mr. Pruitt were negligent and, further, contests the nature and extent of the plaintiff's alleged injuries and damages.

Since the accident occurred in central Pennsylvania, most, if not all of the fact witnesses, including investigating officers are located out of Massachusetts. Since the plaintiff resides in Massachusetts, most, if not all of the medical witnesses are in state. Transfer of venue issues therefore remain pending.

The parties hereby submit this amended discovery schedule, which was approved by the court on this day, March 15, 2006.

Proposed Joint Discovery Plan

The parties propose the following discovery plan:

1. Written discovery and non-expert depositions completed by September 15, 2006.
2. Plaintiff's experts disclosed by September 30, 2006.
3. Defendant's experts disclosed by October 31, 2006.
4. Expert depositions completed by December 15, 2006.
5. Case Management Conference on January 8, 2007.

STEVEN MCDERMOTT
By His Attorney,

Joseph M. Mahaney
Goeguen, McLaughlin, Richards
& Mahaney, P.C.
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FED EX GROUND SYSTEMS, INC.
By its Attorneys,

/s/ James M. Campbell
James M. Campbell (BBO# 541882)
Adam Larson
Campbell Campbell Edwards & Conroy, P.C.
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Boston, MA 02129
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CERTIFICATE OF SERVICE

I, James M. Campbell, hereby swear and affirm that I have this date March 15, 2006 served a copy of the attached Amended Discovery Schedule on all interested parties, by forwarding a copy of same, via first class mail, postage prepaid to the attorney of record, namely, Joseph M. Mahaney, Esquire, Goeguen, McLaughlin, Richards & Mahaney, P.C., The Harrier Beecher Stowe House, 2 Pleasant Street, South Natick, MA 01760.

/s/ James M. Campbell
James M. Campbell